

# Hotwire Communications, Ltd

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification of 2017 covering the prior calendar year of 2017.

1. Date filed: February 15, 2018
2. Name of company covered by this certification: HOTWIRE COMMUNICATIONS, LTD
3. Form 499 Filer ID: 823992
4. Name of signatory: KRISTIN A. JOHNSON
5. Title of signatory: GENERAL MANAGER
6. Certification:

I, Kristin A. Johnson, certify that I am an officer of the company named above and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement ("Attachment A") explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  FEB 12 2018

ENCLOSURES: Attachment A - Statement of Hotwire's CPNI Operating Procedures

**ATTACHMENT A**

**STATEMENT OF CPNI OPERATING PROCEDURES  
for Hotwire Communications, Ltd. ("Hotwire" or the "company")  
in Compliance with 47 CFR §64.2001-.2011**

**I. General**

Hotwire has established policies and procedures to limit the use of and protect access to customer proprietary network information ("CPNI").

**II. Hotwire's Use of CPNI**

1. Hotwire uses, discloses and permits access to CPNI for the following purposes:
  - (a) To provide or market service offerings among the categories of service to which the customer already subscribes from Hotwire.
  - (b) For the provision of customer premises equipment ("CPE"), call answering, voice mail or messaging, protocol conversion, and inside wiring installation, maintenance and repair services.
  - (c) To protect the rights or property of Hotwire, to protect users of the services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
2. Hotwire uses CPNI to market services formerly known as adjunct-to-basic services, such as speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D. and call forwarding.
3. Subject to the opt-out approval set forth below, Hotwire uses CPNI to offer communications-related services to the customer.

**III. Hotwire's Opt-Out Approval Process**

1. Beginning in 2007, Hotwire provided to all of its existing customers, and thereafter every new customer, a written CPNI Notice to obtain opt-out approval from the customer to offer communications-related services to the customer (the "Notice"). The Notice explains: (a) the customer's rights regarding CPNI, including but not limited to, the customer's right to restrict use of, disclosure of, and access to the customer's CPNI, (b) Hotwire's CPNI obligations, and (c) a 24/7 toll-free telephone number and mailing address for opt-out purposes.

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2. Customer accounts are notated to ensure that: (a) Hotwire does not use CPNI to offer communications-related services prior to the expiration of the 33 day opt out period, (b) Hotwire does not use CPNI to offer communications-related services to customers who have elected to opt-out from the offers, and (c) customers receive a CPNI Notice every two years.
3. Hotwire only uses CPNI for purposes of offering communications-related services to customers that have called Hotwire's customer service department. Hotwire does not use CPNI for any other marketing purposes, including but not limited to, outbound telemarketing calls, email campaigns or direct mail. Hotwire does not disclose CPNI to third-parties other than as set forth herein.

### **IV. Training, Management and Record Keeping**

1. Hotwire maintains records of all notices required by the Commission's CPNI regulations, for a minimum of one (1) year.
2. Hotwire shall notify the Commission of any instance where Hotwire's opt-out mechanisms do not work properly and the problem is more than an anomaly. Hotwire shall maintain records of such notifications for at least two years.
3. Hotwire provides each of its employees with Hotwire's Customer Proprietary Network Information Protection Policy ("Policy"), requires each employee to execute an Acknowledgment of the Policy, and trains company employees regarding the authorized use of CPNI, as well as when use of CPNI is not permitted. Hotwire has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
4. For any use of CPNI other than as set forth herein, Hotwire has a supervisory review process regarding compliance with the Commission's rules relating to protection of CPNI. The purpose of this supervisory review process is to ensure compliance with Hotwire's Policy. Prior to making any use of CPNI, Hotwire personnel must first consult with Hotwire's General Counsel, in-house Regulatory Counsel, and Operations Manager regarding the proposed use and the establishment of procedures to ensure compliance with the Commission's rules and Hotwire's Policy.
5. In the event of a breach of Hotwire's customers' CPNI, Hotwire shall notify the United States Secret Service and the Federal Bureau of Investigation, and, after completing the process of notifying the governmental agencies, the affected customers. Hotwire shall maintain records of such notifications for at least two years.
6. In the event that Hotwire must provide contractors with CPNI information for the purposes set forth in Section II.1, Hotwire requires the execution of a confidentiality agreement, which has specific CPNI confidentiality provisions.
7. Hotwire sends a letter to each customer notifying them of any changes to their passcode, security question, online account passcode, or address of record.

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8. Hotwire employees are encouraged to ask questions about CPNI of their managers and Hotwire's Regulatory Counsel. They are also required under the Policy to report any known or suspected breaches of CPNI to the legal department.

### **V. Customer Authentication**

1. Hotwire has implemented procedures whereby it will not provide CPNI without proper customer authentication. In order to authenticate a customer's identity prior to disclosing CPNI over the telephone or the Internet, the customer must provide the customer-selected passcode associated with the account. If the customer has not selected a passcode for the account, Hotwire will call the customer at the telephone number of record and then establish a passcode and provide the requested CPNI. If there is no passcode associated with the account and the customer is not at the telephone number of record, Hotwire will mail the requested CPNI to the customer's address of record.

2. In addition, Hotwire utilizes a back-up customer authentication method in the event of a lost or forgotten passcode (provided that there is already a customer-selected passcode associated with the account), which provides the customer with a security question, the answer to which the customer had previously provided to Hotwire. Once the customer provides the correct answer, they are then authenticated and provided access to their CPNI.

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